

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Qatar Charitable Society**

Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

1. Qatar Charitable Society (QCS), the oldest and largest charity in Qatar, is a part of the Islamic Coordination Council (ICC). The ICC is a coordinating body of Muslim charitable groups established in 1985 in Peshawar, Pakistan to maximize the financial assistance reaching Afghanistan. Sheikh Abdullah Azzam, an initial founder of Al-Qaida, was a member of the ICC leadership prior to his assassination in Peshawar in 1989. Other ICC members include Defendant International Islamic Relief Organization (IIRO), Defendant Saudi Red Crescent Society, and Defendant World Assembly of Muslim Youth.
2. In July 1997, QCS obtained “Special Consultative Status” with the United Nations, sharing the title with other Defendants such as Muslim World League, Islamic African Relief Agency (SDGT), African Muslim Agency, and International Islamic Relief Organization.
3. QCS draws much of its funding primarily from official sources. In October 2002, the Emir of Qatar, Shaykh Hamad bin Khalifa Al Thani, and the Qatari Foreign Minister, Shaykh Hamad bin Jassem bin Jabr Al Thani, invited the President of QCS, Shaykh Abdul Aziz bin Abdulrahman Al Thani, to join them in high-level meetings with the visiting United Nations High Commissioner for Relief, Ruud Lubbers. In addition, an advertisement for QCS’ relief activities in Kosovo speaks of a collaborative partnership with the state-supported Qatar Red Crescent Society. Moreover, until recently, a WHOIS search of the Qatar Charitable Society’s website (www.qsociety.org) listed Hashem Hussein as both the Administrative and Billing

Contact for the site. His corresponding e-mail address, “hashim@MMAA.GOV.QA,” indicates that Mr. Hussein was an employee of the Qatari Ministry of Municipal Affairs and Agriculture.

4. During the mid-1990s, Dr. Abdullah Mohammed Yousef, a director of QCS, used the resources of the charity to help underwrite the financial needs of the Eritrean Islamic Jihad Movement (EIJM). At the time, EIJM recruits, seeking to overthrow their own government and replace it with an Islamic regime, were receiving military training from senior Al-Qaida lieutenants in the Sudan after having been recruited to follow Usama Bin Laden’s international agenda. Several years later, the Deputy Emir of EIJM, Abul Bara’ Hassan Salman, confirmed in an interview, “As for the latest Christian onslaught which is being led by America... I say to the Muslim people everywhere: supporting Jihad and the Mujahideen is the way to remove the nightmare of degradation and humiliation which has rested on the chests of our community in its various forms.”
5. QCS helped distribute a collection of fundamentalist articles titled “Obstacles to the Islamic Resurgence” edited by former Bosnian President Alija Izetbegovic. After September 11, 2001, Izetbegovic stepped down amid controversy that his administration had provided safe haven and travel documents to hundreds of Muslim militants loyal to Al-Qaida.
6. In October 2001, the Azerbaijan Ministry of Justice forcibly closed down its own local QCS office because “under the guise of charity,” QCS was conducting “damaging activities that violate our national interests, as well as [cooperating] with terrorist structures and [distributing] propaganda inciting radical sectarianism, religious hatred and fanaticism.”
7. In 1995, a QCS office founded in neighboring Daghestan (adjacent to Chechnya) dispensed over 3 million Qatari Riyals in less than two years. Daghestani state tax police initiated an inquiry into the organization, and uncovered forged documents and invoices detailing hundreds of thousands of dollars of illicit financial transactions. From the evidence collected, investigators estimated that QCS had given approximately \$1 million to unspecified “Chechen extremists.”

8. In response to allegations by the media that QCS was supporting Arab individuals fighting the Chechen mujihadeen, Al-Thani flatly admitted that, indeed, this might be the case:

“[W]e as a government cannot control the aid going abroad, some of which may go for humanitarian goals, and some may start as humanitarian but end up in another way. However, there is no monitoring because people are sympathizing... We as a government may be able to control our sympathy, although in the end we are only human beings and Muslims... [t]herefore we cannot restrain the people’s feelings in this regard.”

9. Even after the September 11 suicide hijackings, the Qatari regime refused to restrict the fundraising and religious activism of pro-Al-Qaida religious charities, including the Qatar Charitable Society. In September 2001, coinciding with the attacks in America, QCS' official newsletter carried an article titled “Jihad is the Solution!” The author urged faithful Muslims:

“The only way to liberate Palestine is the holy Jihad which mobilizes all potentialities in the Arab and Islamic countries, and in which all Muslims stand as one behind the Mujahideen and support them in their Jihad... The time has come for Muslims to follow in the footsteps of Salahudeen and to restore Jerusalem and Palestine to the Arabs and the Muslims. For Jerusalem is in your hands, Oh, Muslims. There is no solution to the matter save Jihad. ‘You shall readily mobilize, light or heavy, and strive with your money and your lives in the cause of GOD. This is better for you, if you only knew.’(Quran 9:41)”